

CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America v. Maurice Fitzgerald Alexander DOB: 1990; United States Citizen and Erica Lucia Navarro DOB: 1990, United States Citizen	DOCKET NO. MAGISTRATE'S CASE NO. <div style="display: flex; justify-content: space-between;"> 21-01758MJ SEALED </div>
Complaint for violation of Title 18 United States Code § 1591 and § 2423(a)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:	
Count 1	
Between on or about August 2021 and on or about October 2021, in the District of Arizona and elsewhere, Defendants Maurice Fitzgerald ALEXANDER and Erica Lucia NAVARRO knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, in and affecting interstate or foreign commerce, "Jane Doe," knowing or in reckless disregard of the fact that force, threats of force, fraud and coercion, and any combination of such means, would be used to cause "Jane Doe," who had not attained the age of 18 years, to engage in a commercial sex act. All in violation of Title 18, United States Code, Sections 1591(a) and 1591(b)(1).	
Count 2	
Between on or about August 2021 and on or about October 2021, in the District of Arizona, Defendants Maurice Fitzgerald ALEXANDER and Erica Lucia NAVARRO did knowingly transport an individual who had not attained the age of 18 years in interstate and foreign commerce, with the intent that such individual engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense. All in violation of Title 18, United States Code, Section 2423(a).	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:	
In August 2021, Maurice Fitzgerald ALEXANDER recruited "Jane Doe" a fourteen-year-old child, on Snapchat, a social media application, offering employment. On August 19, 2021, ALEXANDER met "Jane Doe" at a hotel in Phoenix, Arizona and sexually assaulted her to see if she would be able to make him money. After traveling to Tucson, ALEXANDER forced "Jane Doe" to perform sex acts with customers/"johns" in exchange for payment; "Jane Doe" was forced to give ALEXANDER all payments. Approximately two to three days later, ALEXANDER introduced "Jane Doe" to Defendant Erica Lucia NAVARRO. NAVARRO and ALEXANDER took "Jane Doe" to an apartment in Tucson where they provided her with cocaine, methamphetamine, and prescription opioids. "Jane Doe" was forced to engage in acts of commercial sex at the apartment. During August and September 2021, "Jane Doe" was transported to El Paso, Texas, Colorado Springs, Colorado, and Las Cruces, New Mexico where she was forced to perform sex acts for money. A review of advertisements placed on commercial sex websites show "Jane Doe" and NAVARRO offering sexual services in Arizona, Colorado, New Mexico, and Texas. On October 13, 2021, "Jane Doe" positively identified a photograph of ALEXANDER and NAVARRO to law enforcement.	
MATERIAL WITNESSES IN RELATION TO THE CHARGE:	
REQUEST DETENTION Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY: AUSA <u>Erica L. Seger</u> ERICA SEGER <small>Digitally signed by ERICA SEGER Date: 2021.10.14 17:13:04 -07'00'</small>	SIGNATURE OF COMPLAINANT <div style="display: flex; align-items: center;"> <div style="flex: 1;"> RYAN K GARVEY </div> <div style="flex: 1; font-size: 0.8em;"> <small>Digitally signed by RYAN K GARVEY Date: 2021.10.14 15:20:22 -07'00'</small> </div> </div> OFFICIAL TITLE Special Agent, HSI
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE ⁽¹⁾ 	DATE October 15, 2021

⁽¹⁾ See Federal rules of Criminal Procedure Rules 3, 4.1 and 54